

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

PETER A. CRAWFORD,

Plaintiff,

v.

Civil Action No.
05-cv-10078 (DPW)

WOLVERINE, PROCTOR & SCHWARTZ, INC.,
STEVEN F. CHILINSKI, and
DEEPAK S. KULKARNI,

Defendants.

JOINT MOTION TO EXTEND PRE-TRIAL DEADLINES

NOW COMES the Plaintiff and Defendants in the above-captioned action (collectively the “Parties”) and jointly move for an order extending the pretrial deadlines contained in the Case Management and Scheduling Order in this matter approximately forty-five (45) days. In support of this motion, the Parties state as follows:

1. Plaintiff commenced this action on January 12, 2005. On June 14, 2005, this Court issued its Scheduling Order, which set forth several pretrial deadlines.
2. To date, the parties have engaged in written, documentary and deposition discovery. Both sides have served initial and follow-up interrogatories, document requests, and the plaintiff has served requests for admissions. To date, five depositions have taken place.
3. The parties have had certain disagreements with respect to the proper scope of discovery in this action. These differences have led to at least four separate discovery motions, all of which have slowed the pace of the discovery process. Certain discovery motions remain

pending as of this date. The overall scope of discovery in this case is also much broader than either of the parties originally foresaw.

4. The Parties are now facing a December 16, 2005 discovery cutoff. Both Parties respectfully submit that additional time is needed so that the Parties may complete discovery, including but not limited to depositions and discovery from non-party witnesses, some of whom may need to be subpoenaed outside of the District of Massachusetts.

5. The Parties are hereby requesting that the pre-trial deadlines be extended as set forth below.

6. The Parties agree that neither party will be prejudiced by this extension.

7. This is the first request for such an extension by either Party thus far.

8. The Parties respectfully submit that no memorandum of law is necessary to support this motion.

9. A proposed order is attached hereto as Exhibit A.

WHEREFORE, both Parties jointly move that the following pre-trial deadlines in this case be extended as follows:

- (a) Discovery close = February 3, 2006
- (b) Summary judgment motion deadline = February 24, 2006
- (c) Responses to summary judgment motions = March 10, 2006
- (d) Status Report filing deadline = March 17, 2006
- (e) Status conference = scheduled at the Court's convenience

Respectfully submitted,

PETER A. CRAWFORD,

WOLVERINE, PROCTOR & SCHWARTZ,
INC., DEEPAK S. KULKARNI, and STEVEN
CHILINSKI,

Plaintiff *Pro Se*

By their attorneys,

/s/ Peter A. Crawford (by Mark M. Whitney
with his express permission)

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Counsel for Defendant

Dated: December 8, 2005

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DEEPAK S. KULKARNI,

Defendants.

**ORDER ON THE PARTIES' JOINT MOTION
TO EXTEND PRE-TRIAL DEADLINES**

THIS CAUSE is before the Court upon the Joint Motion of the Parties to extend certain pre-trial deadlines. Having considered the bases of the Motion, and being otherwise fully advised in the premises, it is:

ORDERED AND ADJUDGED that:

The Parties Joint Motion to Extend Pre-Trial Deadlines is _____.

The Scheduling Order shall be modified as follows:

- (a) Discovery close = February 3, 2006
- (b) Summary judgment motion deadline = February 24, 2006
- (c) Responses to summary judgment motions = March 10, 2006
- (d) Status Report filing deadline = March 17, 2006
- (e) Status conference = _____, 2006

DONE AND ORDERED in Chambers, in Boston, Massachusetts, this ____ day of
December, 2005.

HON. DOUGLAS P. WOODLOCK
United States District Judge

Copies furnished to:

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